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KIMBERLY J. DEL GRECO
JOE HOLCOMBE vs UNITED STATES

November 21, 2019

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF TEXAS

3 SAN ANTONIO DIVISION

4
5
6 JOE HOLCOMBE, et al.) NO. 5:18-CV-00555-XR

7 Plaintiffs) (Consolidated cases)

8 -vs-)

9 UNITED STATES OF)

10 AMERICA)

11 Defendant)

12
13
14 Videotaped Deposition of Kimberly J. Del Greco

15 Washington, DC

16 Thursday, November 21, 2019

17 11:55 a.m.

18
19 Job No: J4693104

20 Pages: 1-201

21 Reported by: Kenneth Norris

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1 a timely manner aided the NICS section to ensure
2 public safety by the denying 120 -- 120,497 firearm
3 background checks in 2016."

4 Q. Okay. First, is it a true statement that in
5 2016, 120,497 firearm background checks were denied?

6 A. That is correct.

7 Q. Okay. And is it a true statement that being
8 able to view valuable information in a timely manner
9 aided the NICS section in ensuring public safety?

10 A. It did.

11 Q. Fair to say that NICS is a program designed
12 to ensure public safety?

13 MR. STERN: Objection.

14 THE WITNESS: It is.

15 BY MR. JACOB:

16 Q. Would it be fair to say that the NICS system
17 decreases the risks of shooting deaths by keeping guns
18 out of the hands of felons?

19 A. No.

20 Q. Why is that?

21 A. I think guns are obtained in many different
22 ways. Our job is to process the firearm background

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1 check solely. That's it.

2 Q. Okay. Do you think NICS decreases the risk?

3 I'm not saying eliminates the risk. I'm
4 saying, does NICS help decrease the risk of shooting
5 deaths by keeping guns out of the hands of felons?

6 A. We've never done a study to determine that.

7 Q. Okay. Well, do you agree that in order for
8 NICS -- the NICS system to work, the FBI needs
9 accurate collection of data and reporting of felons?

10 A. Yes.

11 Q. Do you agree that the more information that
12 you have, the more dangerous criminals that you can
13 prevent from acquiring firearms?

14 A. I think the more information we have, the
15 better decisions we can make. Yes.

16 Q. Sure. Do you agree that the more
17 information you have about deniable offenses of
18 individuals, the better decisions that you can make in
19 preventing individuals who shouldn't have firearms
20 under federal law from acquiring those firearms?

21 A. Yes.

22 Q. Would you expect government agencies to